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DEPARTMENT OF THE NAVY

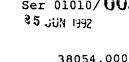
NAVAL AIR STATION MEMPHIS

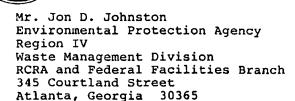
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Subj: EPA ID #TN2170022600

Dear Mr. Johnston:

In accordance with our Draft Corrective Action Management Plan (CAMP) submitted December 19, 1991, the following response to your agency's Notice of Technical Inadequacy (NOTI) dated November 4, 1991, is provided. We agree with all general and specific comments, except for the comments cited below for which we propose a response for your consideration and concurrence:

## Page 4, Comment 5

We recommend that well clusters be installed when the thickness of the aquifer warrants and field screening and/or groundwater sample analysis indicate that contaminants are present. This information will not be available until the first set of wells at a SWMU has been installed. Installing well clusters at predetermined locations without the benefit of field and/or laboratory data could result in an excess expenditure of time and money. The possible installation of well clusters during subsequent investigation phases will be discussed as suggested in Comment 23 on page 10.

## Page 9, Comment 19

We believe that performing slug tests on all of the wells at a site would be excessive. Also, performing both slug tests and a short term pumping test at the same site is somewhat redundant. Short term pumping tests provide higher quality data than slug tests. To avoid excess expense, pump tests should not be conducted until a contamination problem has been identified. Therefore, we propose to conduct short term pump tests at SWMUs where groundwater contamination levels exceed ARARS.

## Page 19, Comment 100

All information available from NAS Memphis indicates that waste was not stored inside Building N-126. Waste was stored on a paved area on the west side of the building in movable (wheeled) tanks called "bowsers." Because the bowsers were movable, it is not possible to define exactly where wastes were stored outside



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the building. No releases have been reported, therefore, no sampling was conducted at N-126. The use of bowsers for hazardous waste storage was discontinued so the wastes could be segregated in drums. The storage area for the drums was in the quonset hut area north of Building N-12. This area was sampled in April 1987 as part of the closure procedure for the facility. The analytical results were presented in the Draft RFI Work Plan as Attachment A. A map showing the sampling locations will be included in the revised work plan.

If you need any additional information or have any questions, please contact Mr. Mark Taylor of Southern Division, Naval Facilities Engineering Command at (803) 743-0573.

Sincerely,

P. M. MOTOLENICH
COR. CEC, USN
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B. DIRECTION OF THE COMMANDING OFFICER
NAVAL AIR STATION MEMPHIS

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